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Attorneys for Plaintiff
TVIIM, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

TVIIM, LLC, a Colorado Limited liability
company,

Plaintiff,

v.

MCAFEE, INC., a corporation,

Defendant.

Case No. 3:13-cv-04545-VC

STIPULATION AND ~~PROPOSED~~
ORDER REGARDING MEDIATION
DEADLINE

MCAFEE, INC., a corporation,

Counterclaimant,

v.

TVIIM, LLC, a Colorado Limited liability
company,

Counterclaim Defendant.

STIPULATION AND [PROPOSED]
ORDER RE MEDIATION DEADLINE
3:13-CV-04545-VC

1 WHEREAS, under the Court's May 15, 2014, Scheduling Order, the deadline for the
2 completion of mediation is December 15, 2014, Dkt. No. 38;

3 WHEREAS, in an Order dated October 31, 2014, the Court continued the discovery cut-
4 off from November 14, 2014 to December 12, 2014, continued the service of opening expert
5 reports from November 24, 2014 to January 16, 2015, but did not continue the deadline for the
6 completion of mediation;

7 WHEREAS, Plaintiff TVIIM, LLC, ("TVIIM") and Defendant McAfee, Inc.'s
8 ("McAfee") believe that they would be in a better position to participate in a mediation and
9 discuss settlement after the completion of expert discovery and after the parties' respective
10 dispositive motions are fully briefed;

11 THEREFORE, to prepare the parties for mediation and to increase the potential for an
12 informal resolution, IT IS HEREBY STIPULATED by and between the parties hereto through
13 their respective attorneys of record, subject to approval by the Court, that the deadline for
14 participating in a mediation is continued from December 15, 2014 to April 10, 2015.

15 Dated: November 20, 2014

LATHROP & GAGE LLP

18 By: /s/ John Shaeffer

19 John J. Shaeffer
20 Attorneys for Plaintiff
TVIIM, LLC

21 Dated: November 20, 2014

22 WILMER CUTLER PICKERING HALE
AND DOOR LLP

25 By: /s/ Joseph J. Mueller

26 Joseph J. Mueller (*pro hac vice*)
Attorneys for Defendant
McAfee, Inc.

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

2 

3 **Hon. Judge Vince Chhabria**
4 **United States District Judge**

Dated: November 26, 2014